

**GRIGNARD COMPANY, INC.**

900 PORT READING AVENUE, P.O. BOX 221  
PORT READING, NEW JERSEY 07064

TEL: (908) 541-6661  
FAX: (908) 541-1916

September 16, 1996

Mr. Richard L. Caspe  
United States EPA - Region 2  
290 Broadway  
New York, NY 1007-1866

SEP 23 1996

Re: Request for Information Under 42U.S.C. 9601 et seq. Diamond Alkali Superfund Site, Passaic River Study Area

Dear Mr. Caspe,

In reference to your letter of August 20, 1996, I am replying to the best of my knowledge the questions concerning our location at 185 Foundry Street (Bldg. #7), Newark, NJ.

I would like to mention that not to my knowledge, Grignard Company was originally listed under the wrong SIC number as a generator of Hazardous Waste. This was changed to the right SIC number, documentation is enclosed. (Exhibit A)

REQUEST FOR INFORMATION

- 1 (i) We were at this location from February 1975 to October 1984.
- 2 (a) We didn't have a permit.  
(b) We didn't have a permit.
- 3 The hazardous compounds we blended, not manufactured, were:  
Dichlorobenzene  
1,1,1 Trichloroethane  
Methylene Chloride
- 4(a) For the U S Navy, Grignard Company cold blended, by volume the hazardous chemical compounds listed above for use in cleaning wire rope.  
(b) 1,1,1 Trichloroethane; methylene chloride and orthodichlorobenzene.  
(i) chlorinated hydrocarbons

848340001

- (ii) 1,1,1 Trichloroethane 55% by volume  
methylene chloride 35% by volume  
orthodichlorobenzene 5% by volume
- (iii) There was no waste from this blending operation and these compounds were not mixed with any other compounds.

5 The hazardous compounds were received and stored in 55 gallon steel drums. These compounds were transferred into the blending tank by gravity and then pumped into the shipping containers.

- (a) Emile E. Grignard and Dave Hecht managed the storage and blending operation.
- (b) S & W Waste Inc., 115 Jacobus Avenue, South Kearny, NJ 07032.
- (c) All hazardous substances were contained in one area as prescribed by the fire department.
  - (i) Drums were not stored outside.
  - (ii) Drums were not stored outside.
- (d) Any waste was removed by S & W Waste Inc.

- 6(a) There was no waste water at this facility
- (b) There were no floor drains or other disposal drains at this facility

- 7(a) The total volume of hazardous chemicals blended at this facility was 5787 gallons
- (b) Nothing was discharged into the Passaic River

- 8(a) There were no leaks, spills, explosions, fire or discharge at this facility
- (b) There was no contamination of the soil

- 9(a) There was no flooding into our facility

- 10(a) Except for the wrong SIC number there were no violations (Exhibit A)
- (b) In February 1982, S & W Waste removed 440 gallons of off spec. phenyl dicresyl phosphate (Exhibit B).

- 11(a) Exhibit A

- 12 Not to my knowledge

- 13(a) Grignard Company leased the property
- (b) Leased (Exhibit C)
- (c) Honig Chemical & Processing occupied this facility prior to us and Conus Chemical after.

- 14(a) GRIGNARD CHEMICAL CO. was changed to GRIGNARD COMPANY, INC.
- (b) Emile E. Grignard, 8 Fairway East, Colts Neck, NJ
- (c) New Jersey
- (d) "Certificate of Incorporation" (Exhibit D)

- (e) Not a subsidiary or affiliate of another company
- (f) No predecessor
- (g) None
- (h) N/A
- (i) None

15     Emile E. Grignard - President  
         900 Port Reading Avenue  
         Port Reading, NJ 07064  
         (908) 541-6661

ATTACHMENT A

REQUEST FOR INFORMATION

Background

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. EPA has information indicating that hazardous substances from your facility located at 185 Foundry Street in Newark, New Jersey may have been discharged into the Passaic River.

Please provide the information requested below, including copies of all available documentation that supports your answers.

1) How long has your company operated at the facility designated above? If your company no longer operates at this facility, during what years did your company operate at the facility?

2) a) Does your company have or has it in the past had a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.? If "yes", please provide the years that your company held such a permit and its EPA Identification Number.

b) Does your company have or has it in the past had a permit or permits issued pursuant to the Federal Water Pollution Control Act, 33 U.S.C. § 1251, et seq.? If "yes", please provide the years that your company held such a permit.

3) Did your company receive, utilize, manufacture, discharge, release, store or dispose of any materials containing the following substances:

	Yes	No
2,3,7,8 tetrachlorodibenzo-p-dioxin	_____	_____
or other dioxin compounds	_____	_____
Benzene	_____	_____
Chlorobenzene	_____	_____
Dichlorobenzene	_____	_____
Dichloromethane	_____	_____
Other chlorinated hydrocarbons	_____	_____
If "yes", please list specific compounds.		
Ethyl benzene	_____	_____
Naphthalene	_____	_____
Polyaromatic Hydrocarbons	_____	_____
If "yes", please list specific compounds.		
Pyrene	_____	_____
Tetrachlorobenzene	_____	_____
Toluene	_____	_____
1,1,1-trichloroethane	_____	_____
Xylene	_____	_____

	Yes	No
PCBs	_____	_____
Arsenic	_____	_____
Cadmium	_____	_____
Chromium	_____	_____
Copper	_____	_____
Lead	_____	_____
Mercury	_____	_____
Nickel	_____	_____
Silver	_____	_____
Zinc	_____	_____
Cyanide	_____	_____

4) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3), were a product or by-product.

b) During what parts of the manufacturing processes identified in the response to items (4)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (3), generated?

i) Describe the chemical composition of these hazardous substances.

ii) For each process, what amount of hazardous substances was generated per volume of finished product?

iii) Were these hazardous substances combined with wastes from other processes? If so, wastes from what processes?

5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4). Include information on the following:

a) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.

b) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.

c) Describe all storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.

i) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.

ii) When drums were stored outside, were empty drums segregated from full drums?

d) What processes do you use to treat your waste? What do you do with the waste after it is treated?

6) a) For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4):

i) Was the waste stream discharged into a sanitary sewer and if so, during what years?

ii) Were they treated before being discharged to the sanitary sewer and if so, how? Please be specific.

iii) If the waste waters were not discharged to the sanitary sewer, where were they disposed and during what years?

iv) Please provide the results of any analyses performed on any waste process streams generated at the facility.

b) For floor drains or other disposal drains at the facility:

i) Did the drains connect to a sanitary sewer and if so, during what years?

ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?

c) i) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so, during what years?

ii) If catch basins or lagoons existed, were they lined or un-lined?

iii) What was stored in the lagoons?

iv) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and

during what years? What was the chemical composition of any waste waters released, and during which years?

d) Please supply diagrams of any waste water collection, transport or disposal systems on the property.

7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, provide the total amount generated during the operation of the facility on an annual basis.

b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, disposed of in the Passaic River or discharged to the Passaic River? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.

8) a) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4), were released on the property, into the waste water or storm drainage system at the facility or to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

b) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.

9) a) Was your facility ever subject to flooding. If so, was the flooding due to:

i) overflow from sanitary or storm sewer back-up, and/or

ii) flood overflow from the Passaic River?

b) Please provide the date and duration of each flood event.

10) a) Please provide a detailed description of any civil, criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation,

storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.

b) EPA has information that your facility received a Notice of Violation in 1982. Please provide details of this violation and how it was resolved.

11) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

12) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above?

b) If so, please provide all other documents pertaining to the results of these analyses.

13) a) Has your company owned the facility at the location designated above? If so, from whom did your company purchase the property and in what year? If your company subsequently sold the property, to whom did your company sell it and in what year? Please provide copies of any deeds and documents of sale.

b) If your company did not own the facility, from whom did your company rent the facility and for what years? Please provide copies of any rental agreements.

c) To the extent that you know, please provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.

14) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.

a) State the legal name of your company.



- b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.
  - c) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey.
  - d) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.
  - e) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.
  - f) Identify any predecessor organization and the dates that such company became part of your company.
  - g) Identify any other companies which were acquired by your company or merged with your company.
  - h) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey, and nature of business activity, for each company identified in the responses to items (14)(e), (f), and (g), above.
  - i) Identify all previous owners or parent companies, address(es), and the date change in ownership occurred.
- 15) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of NJ:

County of Middlesex:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

Emile E. Grignard

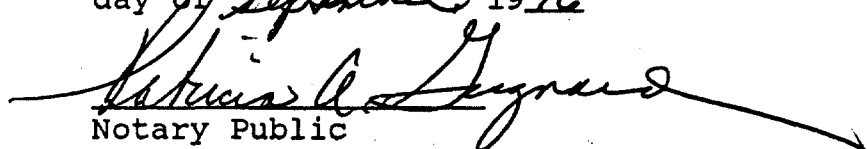
NAME (print or type)

President

TITLE (print or type)

  
SIGNATURE

Sworn to before me this 17th  
day of September 1996

  
Notary Public

PATRICIA A. GRIGNARD  
Notary Public, New Jersey  
My Commission Expires Dec. 3, 1998

848340010

# Exhibit A



## GRIGNARD COMPANY, INC.

P.O. BOX 523, 60 GRANT AVE., CARTERET, N.J. 07008

TEL: (201) 541-6661

FAX: (201) 541-1916

The business operation of GRIGNARD COMPANY at Bldg.#7 in Newark consisted of:

- (1) Mixing petroleum oil with non hazardous components to make cutting oils, lubricants and metal preservatives.
- (2) Mixing alkaline additives to water to make water base cleaners.
- (3) Mixing additives with chlorinated hydrocarbons to make a non-flammable wire rope cleaner for the Navy.
- (4) Mixing alkaline additives for metal cleaners and a corrosion inhibitor for the Navy's catapult system.
- (5) Mixing diester compounds to make lubricants for miniature bearings and instruments.

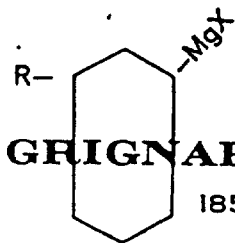
All raw materials received go into a finish product with no waste from the blending operations or leakage.

There are no floor drains in this building that would allow contamination of the water drainage system outside the building.

The only exits from the building are an over-head door and a front door; and we had portable blockage at these locations if leakage or spillage did occur, which it didn't.

848340011

*Exhibit A*



**GRIGNARD CHEMICAL CO., INC.**

185 FOUNDRY STREET, NEWARK, NEW JERSEY 07105 • TELEPHONE 201-344-4433

August 24, 1981

Information Services  
EPA Region # 2  
26 Federal Plaza  
New York, New York 10278

Attn: Mrs. Cooper

Dear Mrs. Cooper:

In regards to our conversation concerning the storage of hazardous material classified by EPA, I have enclosed our location data you requested.

Our location is 185 Foundry Street, Newark, New Jersey, 07105, Bldg. # 7. It's longitude is 40°44" North and Latitude 74°7"59 sec. West. The Topographic map and photos are attached.

If you require additional information please contact me.

Very truly yours,

Emile E. Grignard

EEG:pg  
enc.

848340012



**GRIGNARD CHEMICAL CO., INC.**

185 FOUNDRY STREET, NEWARK, NEW JERSEY 07105 • TELEPHONE 201-344-4433

September 21, 1981

Mr. Harry Ruisi  
Permits Administration Branch  
U.S. EPA, Region II  
26 Federal Plaza  
New York, New York

Dear Mr. Ruisi:

I would like to withdraw my TSDF status application and retain my generator status.

Your inspector, Mr. Elmendorf, informed me that since I blend new raw materials and do not have any waste I wouldn't be in the toxic waste category.

The only time I would have toxic waste is if my chlorinated hydrocarbons became contaminated and I would have to ship it to be reclaimed or disposed of.

Thank you for your assistance.

Very truly yours,

Emile E. Grignard

EEG:pg  
CC. C.H. Elmendorf

*\* he said only waste chemicals have a 90 day  
time limit - new or virgin chemicals do not have a  
time limit*

848340013



State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT  
120 Rt. 156, CN 402, Yardville, N.J. 08625

JACK STANTON  
DIRECTOR

LINO F. PEREIRA  
DEPUTY DIRECTOR

Gignard Chemical Company  
Emile Grignard, President  
185 Foundry Street  
Newark NJ 07105

Re: NOTICE OF VIOLATION  
FAILURE TO SUBMIT ANNUAL REPORT

Dear Ms. Grignard:

Pursuant to the provisions of the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E-1, et seq., the Department of Environmental Protection has determined by examination of our files that you violated N.J.A.C. 7:26-7.6(f)2 in that you failed to submit an annual report by March 1, 1982.

NOW, THEREFORE, YOU ARE HEREBY NOTIFIED that your facility shall submit the required annual report within fifteen (15) days of receipt of this Notice to: Frank Coolick, Bureau of Engineering Review, 32 East Hanover Street, Trenton, New Jersey 08625.

BE ON NOTICE that the Solid Waste Management Act establishes penalties of up to \$25,000 per day for violation of the Department's hazardous waste management regulations. Your failure to correct the above violation, or any future violation, may result in a penalty action by this Department. Failure to submit the required report by the specified date will result in daily fines as follows:

- |      |   |              |
|------|---|--------------|
| i.   | During the first week after the deadline:                                   | \$100/day    |
| ii.  | During the second week after the deadline:                                  | \$200/day    |
| iii. | During the third week after the deadline:                                   | \$500/day    |
| iv.  | During the fourth week after the deadline<br>and subsequently: a maximum of | \$25,000/day |

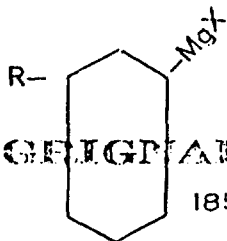
If you have any questions regarding this Notice, please call the Bureau of Engineering Review at (609) 292-9880.

DATE

Nov 5, 1982

David J. Shotwell  
David J. Shotwell, Chief  
Bureau of Compliance and Enforcement

rh



GRIGNARD CHEMICAL CO., INC.

185 FOUNDRY STREET, NEWARK, NEW JERSEY 07105 • TELEPHONE 201-344-4433

November 9, 1982

Mr. Frank Coolick  
Bureau of Engineering Review  
32 East Hanover Street  
Trenton, New Jersey 08625

Dear Mr. Coolick:

In regards to your letter of November 5, 1982 we do not purchase or use hazardous waste materials in manufacturing.

The only time we would have waste materials on our premise is when they become contaminated. These chemicals would be removed by a licensed hazardous waste removal company.

I have enclosed a copy of my September, 1981 letter to EPA to change my TSDF status.

Thank you for your attention to this matter.

Very truly yours,

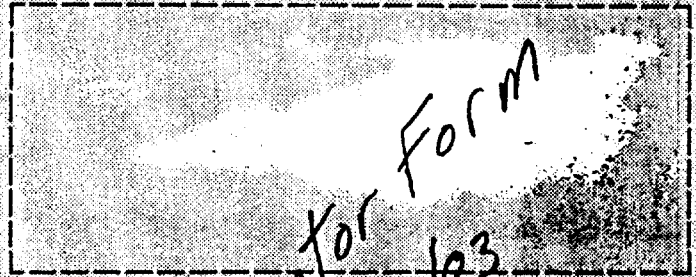
Emile E. Grignard

EEG:pg  
enc.

848340015

## 1981 STATUS SHEET FOR NON-REGULATED GENERATORS

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a pre-printed label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.



## S-I. GENERATOR'S EPA I.D. NUMBER

EWJD0022070931  
1 2 13 14 15

non generator Form  
sent in 1/15/83

## S-II. NAME OF FACILITY

GRIGGARD CHEMICAL COMPANY  
30 69

## S-III. FACILITY MAILING ADDRESS

3185 FIDELITY ST  
15 16 45

Street or P.O. Box

4 NEWARK NJ 07105  
15 16 41 42 47 51

City or Town

State Zip Code

## S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)

- a. NON-HANDLER—did not handle hazardous waste in any quantity in 1981 ..... 1
- b. SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR §261.5) ..... 2
- c. EXEMPT—all wastes generated in farming operations (40 CFR §262.51) or exempt pursuant to 40 CFR §261.4 ..... 4
- d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR §261.2 and 40 CFR §261.6 ..... 5
- e. CLOSED—installation was closed prior to 1981 ..... 9

## S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RCRA Annual Reporting requirement.

Emile E Grignard President 1/15/83  
Print/Type Name Title Signature of Authorized Representative Date Signed

848340016





State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 028, Trenton, N.J. 08625

December 15, 1983

MARWAN M. SADAT, P.E.  
DIRECTOR

LINO F. PEREIRA, P.E.  
DEPUTY DIRECTOR

Sirs:

New Jersey Hazardous Waste Regulations (N.J.A.C. 7:26-7.4) require each generator to file an Annual Report with the Department of Environmental Protection. This Annual Report for calendar year 1983 is due no later than March 1, 1984. To assist you in fulfilling the annual reporting requirements, I have enclosed a copy of the report form that must be used. Instructions on how to properly fill out the report are attached. Please note that this is the same form that was used last year.

It is important that your Annual Report be sent to:

GENERATORS ANNUAL REPORT - MANIFEST SECTION  
N.J. DEP. Division of Waste Management  
Bureau of Hazardous Waste Classification & Manifest  
32 East Hanover Street  
Trenton, New Jersey 08625

1/10/84  
Yellow copy  
Sent - "We manifested  
no waste in 1983"

All Generators having an EPA ID number must submit a report. If no waste was manifested during 1983 fill out #1, #2, and #3, of the form and write "No waste manifested during 1983". If you have used a New Jersey manifest to move any waste, you must file a report. If you have more than one EPA ID number, a report must be filed for each number. PLEASE NOTE: Small quantity Generators who have obtained an EPA ID number must file a report.

Please verify the accuracy of your Company's name, address and EPA ID number on your mailing label. If your Company has changed its name in the calendar year, please enter the former name in parentheses.

This year we are including a Company information sheet that must be completed and returned with your annual report.

The State is now fully computerized and all information submitted on your annual report will be checked and verified. Any discrepancies may invoke enforcement action, including fines and penalties.

I hope the enclosed Annual Report form and hazardous waste information will assist you in your hazardous waste management practices. If you require assistance or need additional information concerning the Annual Report, please call Shirley Allen at (609) 292-8341.

Sincerely yours,

*David J. Leu*

David J. Leu, Ph. D.  
Chief

Bureau of Hazardous Waste  
Classification & Manifest

PR8:ska  
Enclosures

New Jersey Is An Equal Opportunity Employer

848340017



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

WJD002201093

GRIGNARD CHEMICAL CO INC  
185 FOUNDRY ST  
NEWARK

NJ 07105

INSTALLATION ADDRESS

195 FOUNDRY ST BLDG 07  
NEWARK

NJ 07105

EPA Form 8700-12A (4-80)

**Oxford** Pandaflex  
CORPORATION

STOCK No. 752 1/3

1/29/85  
Mr. Ali Chaudhry who works  
for Frank Coolick said ~~the waste~~  
~~delisted from the TSD Facility~~  
10/10/84 as noted TSD  
Facility

848340018

HARRY RUISE

PERMITS ADMINISTRATION BRANCH

US EPA, REGION II

26 FEDERAL PLAZA NY NY

withdrew TSD status

Keep gen. status



N. J. DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

CHARLES N. ELMENDORF

INSPECTOR, HAZARDOUS WASTE  
609-292-9877

SOLID WASTE ADMINISTRATION  
32 EAST MANOVER STREET  
TRENTON, NEW JERSEY 08625



7/1/82 Tom Tacconi EPA - N.Y. 212-264-9880  
said he was sending me a new classification  
number as a compounder of virgin products

848340019



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON  
DIRECTOR

LINO F. PEREIRA  
DEPUTY DIRECTOR

03 MAR 1983

Grignard Chemical Co., Inc.  
Emile Grignard, President  
185 Foundry Street  
Newark, NJ 07105

RE: Facility Operating Status

Dear Sir:

The Bureau of Hazardous Waste Engineering has reviewed your company's response to the Notice of Violation, Failure to Submit Annual Report. The Bureau finds that the response contains adequate information to determine the operating status of this facility with respect to N.J.A.C. 7:26-1 et seq., the New Jersey Hazardous Waste Management Regulations. The Bureau has determined that the company's hazardous waste treatment, storage or disposal facility as delineated in the company's RCRA Part A application and identified by the following EPA ID Number:

EPA ID NO. NJD002201093

has been excluded from regulations under N.J.A.C. 7:26-1.1 et seq. because your facility accumulates hazardous waste on-site for less than 90 days. This exclusion classifies your facility solely as a generator provided the following conditions are complied with:

1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
3. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

*New Jersey Is An Equal Opportunity Employer*

848340020

5. For bulk accumulation of dry hazardous waste materials, the waste pile is managed according to the following:

- (i) The waste pile is no larger than 200 cubic yards; and
- (ii) The pile shall be placed on an impermeable base that is compatible with the waste; and
- (iii) Run-on shall be diverted away from the pile; and
- (iv) Any leachate and run-off from the pile must be collected and managed as a hazardous waste.

This written acknowledgement of the exclusion of the above identified facility from N.J.A.C. 7:26-1 et seq. is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occurring at the site mentioned above.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities" which would include the TSD facility annual report. It is the company's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

As a result of the conclusions previously made, the Notice of Violation entitled "Failure to Submit Annual Report" signed by Mr. David Shotwell is rescinded and need not be complied with.

If you have any questions on this matter, please call my office at (609) 292-9880.

Very truly yours,



Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering

FC:jb

cc Dave Shotwell  
NJDEP, Division of Waste Management

Tom Taccone  
USEPA, Region II

848340021

# NEWARK FIRE DEPARTMENT

## FIRE PREVENTION DIVISION

1010-18th AVENUE

FIRE INSPECTION RECORD

TELEPHONE 236-7486

LOCATION OF BUILDING 1010-18th Ave  
 TENANT John Chang  
 OWNER OR AGENT John Chang  
 ADDRESS OF OWNER 1010-18th Ave  
 BUILDING TYPE Other

INSPECTOR Hofman  
 DATE OF INSPECTION 6/10/84  
 PERSON CONTACTED Emilio  
 PHONE NO.   
 NUMBER OF UNITS

You are hereby notified the following Violations of the Fire Prevention Code exist at the above Property. Failure to correct the Violations listed below will result in a complaint being filed against you in Municipal Court.

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> 1-PERMITS                      | <input type="checkbox"/> 19-LIGHTING           | <input type="checkbox"/> 37-YARD HYDRANT                           |
| <input type="checkbox"/> 2-SMOKE DETECTORS              | <input type="checkbox"/> 20-FLAMMABLE LIQ.     | <input type="checkbox"/> 38-PROPER SIGNS & LABELS                  |
| <input type="checkbox"/> 3-SPRINKLER OR SUPPRESSION SYS | <input type="checkbox"/> 21-HAZARDOUS MAT.     | <input type="checkbox"/> 39-FENCES & GATES                         |
| <input type="checkbox"/> 4-EXITS                        | <input type="checkbox"/> 22-EMERGENCY LIGHTING | <input type="checkbox"/> 40-UNPROTECTED VERTICALLY OPENING         |
| <input type="checkbox"/> 5-VACANT BUILDING              | <input type="checkbox"/> 23-DUCTS              | <input type="checkbox"/> 41-TANKS                                  |
| <input type="checkbox"/> 6-FIRE EXTINGUISHERS           | <input type="checkbox"/> 24-ELECTRICAL         | <input type="checkbox"/> 42-COMPACTOR                              |
| <input type="checkbox"/> 7-HEATING UNIT                 | <input type="checkbox"/> 25-WEEDS              | <input type="checkbox"/> 43-DUMBWAITERS                            |
| <input type="checkbox"/> 8-ALARM SYSTEM                 | <input type="checkbox"/> 26-WALLS & CEILINGS   | <input type="checkbox"/> 44-SQUATTERS                              |
| <input type="checkbox"/> 9-DETECTION SYSTEM             | <input type="checkbox"/> 27-ELEVATORS & SHAFTS | <input type="checkbox"/> 45-FIRE PLACE                             |
| <input type="checkbox"/> 10-FIRE DOORS                  | <input type="checkbox"/> 28-INCINERATORS       | <input type="checkbox"/> 46-ACTION REQUIRED BY ANOTHER CITY AGENCY |
| <input type="checkbox"/> 11-RUBBISH                     | <input type="checkbox"/> 29-DRAFT CURTAINS     | <input type="checkbox"/> 47-OTHER (LISTED BELOW)                   |
| <input type="checkbox"/> 12-STORAGE                     | <input type="checkbox"/> 30-AISLE              |  |
| <input type="checkbox"/> 13-FIRE ESCAPE                 | <input type="checkbox"/> 31-SMOKING AREA       |  |
| <input type="checkbox"/> 14-CEILING OVER FURNACE        | <input type="checkbox"/> 32-NO SMOKING SIGNS   |  |
| <input type="checkbox"/> 15-CHIMNEY & FLUE              | <input type="checkbox"/> 33-OCCUPANCY LOAD     |  |
| <input type="checkbox"/> 16-FIRE LANES                  | <input type="checkbox"/> 34-REFRIGERATION UNIT |  |
| <input type="checkbox"/> 17-EXIT SIGNS                  | <input type="checkbox"/> 35-OPEN FLAME         |  |
| <input type="checkbox"/> 18-HOUSE KEEPING               | <input type="checkbox"/> 36-HAZARDOUS PROCESS  | <input type="checkbox"/> NO ENTRY                                  |

### REMARKS

*Inspected premises and found in good order.*  
*Left applications for 1984 permit renewal.*  
*C-11-23"0 & Due Feb. 1, 1984*  
*Mod 33"0*

848340022

1st Notice Mailed \_\_\_\_\_ By \_\_\_\_\_

2nd Notice Mailed \_\_\_\_\_ By \_\_\_\_\_ Signed \_\_\_\_\_

RECEIVED BY  
 INSPECTOR

EXHIBIT B

## PART B: GENERATOR'S COPY

GENERATOR EPA ID NO.

NJ D002201093

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF  
DELIVERY AND NON-TAMPERING WITH SHIPMENT-ALSO PRINT SIGNATURE*Chano**CRECO*

DATE DELIVERED

2 18 82  
MO. DAY YR.TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION  
OF RECEIPT OF SHIPMENT-ALSO PRINT SIGNATURE

TRANSPORTER NO. 2 SWA REGISTRATION NO.

DATE RECEIVED

MO. DAY YR.

TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF  
DELIVERY AND NON-TAMPERING WITH SHIPMENT-ALSO PRINT SIGNATURE

DATE DELIVERED

MO. DAY YR.

TREATMENT STORAGE OR DISPOSAL FACILITY INDICATION OF ANY DIFFERENCES BETWEEN MANIFEST  
AND SHIPMENT OR LISTING OF REASONS FOR AND DISPOSITION OF REJECTED MATERIALS

HANDLING METHOD

1 *Sol* 4  
2 5  
3 6

TSD FACILITY EPA ID NO.

NJ D00968165837

TREATMENT STORAGE OR DISPOSAL FACILITY SIGNATURE & CERTIFICATION  
OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE*Gar Wast R Davidson**DAVIDSON*

TITLE

*Secy*

DATE RECEIVED

12 18 82  
MO. DAY YR.In case of emergency or spill immediately call the State the Emergency occurred in  
and the N.J. Dept. of Environmental Protection  
(609) 292-5500 (Day) (609) 292-7172 (Night)

DOCUMENT NO.

NJ

0095704

TO BE FILLED OUT BY  
TRANSPORTERTO BE FILLED OUT BY  
TSD FACILITY

848340023

Form VHW-001 (10/80)

STATE OF NEW JERSEY  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**HAZARDOUS WASTE MANIFEST**

Please TYPE all information.

**PART A: SEND TO DISPOSER'S STATE**

DOCUMENT NO.

NJ 0095704

GENERATOR NAME <b>GRIGNARD CHEMICAL CO.</b>		PHONE (INCLUDE AREA CODE) <b>201-344-4433</b>	EPA ID NO. <b>NJ D0022D109</b>
ADDRESS (STREET - CITY - STATE - ZIP CODE) <b>185 FOUNDRY STREET, NEWARK, N.J.</b>			
TRANSPORTER NO. 1 <b>S &amp; W WASTE, INC.</b>		PHONE (INCLUDE AREA CODE) <b>201-344-4004</b>	EPA ID NO. <b>NJ D09686583</b>
ADDRESS (STREET - CITY - STATE - ZIP CODE) <b>53 PENNSYLVANIA AVENUE, SO. KEARNY, NJ</b>			
TRANSPORTER NO. 2		PHONE (INCLUDE AREA CODE)	EPA ID NO.
ADDRESS (STREET - CITY - STATE - ZIP CODE)			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY <b>S &amp; W WASTE, INC.</b>		PHONE (INCLUDE AREA CODE) <b>201-344-4004</b>	EPA ID NO. <b>NJ D09686583</b>
SITE ADDRESS (STREET - CITY - STATE - ZIP CODE) <b>53 PENNSYLVANIA AVENUE, SO. KEARNY, N.J.</b>			

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. \_\_\_\_\_ OF A TOTAL OF \_\_\_\_\_. THE FIRST MANIFEST DOCUMENT NO. IS NJ →

1.	2.	3.	4.	5.	6.	UN	FORM	NET QUANTITY	UNITS	CONTAINERS		EPA HAZ CODE	EPA WASTE TY
										NO.	TYPE		
1. <i>Hazardous</i>						9189	1	440	1	8	01		
2. <i>Liquids</i>													
3.													
4.													
5.													
6.													

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

*phenyl di cresyl phosphate*

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE <i>Emile E. Grignard</i>		TITLE <i>Pres.</i>	DATE SHIPPED MO. <u>2</u> DAY <u>18</u> YR. <u>82</u>	EXPECTED ARRIVAL DATE MO. <u>2</u> DAY <u>18</u> YR. <u>82</u>
TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE <i>GRISCO</i>		TRANSPORTER NO. 1 SWA REGISTRATION NO. <b>NJ S.W.A.S. 30,02A.M</b>	DATE RECEIVED MO. <u>2</u> DAY <u>18</u> YR. <u>82</u>	

848340024



4.

JUL 27 1975

EXHIBIT C

**This Agreement,**

BETWEEN

KEM REALTY CO.,

a New Jersey Corporation, located at 70 Blanchard St., Newark, N. J. 07105

as Landlord and

GRIGNARD CHEMICAL COMPANY, a New Jersey Corporation, located at 185 Foundry St., Newark, N. J. 07105

as Tenant

**WITNESSETH:** That the said Landlord has let unto the said Tenant and the said Tenant has hired from the said Landlord, the following premises: Building #7 of Landlord's property located at the intersection of Roanoke Avenue and Foundry Street in Newark, N. J. 07105

for the term of **Three (3) Years**

to commence from the **1st day of March 1975**, and to end on the **28th day of February 1978**, to be used and occupied only for **chemical processing**

upon the conditions and covenants following

**1st: That the Tenant shall pay the annual rent of Seven Thousand and Twenty Dollars (\$7,020.00)**

said rent to be paid in equal monthly payments in advance on the **1st day of each and every month during the term aforesaid, as follows: \$585.00 upon the execution and delivery hereof in payment of the first month's rent and \$585.00 on the first day of each and every month of the term thereafter, without demand therefor.**

**2nd: That the Tenant shall take good care of the premises and shall at the Tenant's own cost and expense make repairs**

and at the end or other expiration of the term, shall deliver up the demised premises in good order or condition, damaged by the elements excepted.

**3rd: That the Tenant shall promptly execute and comply with all statutes, ordinances, rules, orders, regulations and requirements of the Federal, State and City Government and of any and all their Departments and Bureaus applicable said premises, for the correction, prevention, and abatement of nuisances, violations or other grievances, in, upon connected with said premises during said term; and shall also promptly comply with and execute all rules, orders, regulations of the Board of Fire Underwriters, or any other similar body, for the prevention of fires, at the Tenant's own cost and expense.**

**4th: That in case the Tenant shall fail or neglect to comply with the aforesaid statutes, ordinances, rules, orders, regulations and requirements or any of them, or in case the Tenant shall fail or neglect to make any necessary repairs, then the Landlord or the Landlord's Agents may enter said premises and make said repairs and comply with any and all of the statutes, ordinances, rules, orders, regulations or requirements, at the cost and expense of the Tenant and in case of**

848340025

EXHIBIT D

SERIAL NUMBER

5

INCORPORATED UNDER THE LAWS OF  
THE STATE OF NEW JERSEY

SHARES

-1-

# GRIGNARD CHEMICAL COMPANY, INC.

12,500 COMMON SHARES

PAR VALUE \$10. EACH

FULLY PAID AND NON-ASSESSABLE

*[Signature]*  
**This Certificate that**

EMILE E. GRIGNARD

is the

owner of One (1)

Common Shares of

GRIGNARD CHEMICAL COMPANY, INC.

transferable on the books of the Corporation by the holder hereof in person or by duly authorized Attorney, upon surrender of this Certificate properly endorsed.

Witness the Seal of the Corporation and the signatures of its  
duly authorized Officers affixed this 19th  
day of May, 1970

*[Signature]*  
SECRETARY TREASURER

*[Signature]*  
PRESIDENT

848340026